# UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

SUNCOAST POST–TENSION, LTD.,	§	
Plaintiff	§	
	§	
VS.	§	
	§	Civil Action No.
PETER SCOPPA, SANDEEP N. PATEL,	§	
THE STERLING ENGINEERING GROUP	§	4:13-CV-03125
OF COMPANIES, PT USA, and OTHERS	§	
UNKNOWN,	§	
Defendants	§	
	§	

# AGREED STIPULATION FOR EXTENSION OF TIME FOR DEFENDANTS TO RESPOND TO PLAINTIFF'S COMPLAINT

TO THE HONORABLE UNITED STATES DISTRICT JUDGE VANESSA D. GILMORE:

COMES NOW, Plaintiff SUNCOAST POST–TENSION, LTD. ("Suncoast"), and Defendants PETER SCOPPA ("Scoppa"), SANDEEP N. PATEL ("Patel"), THE STERLING ENGINEERING GROUP OF COMPANIES ("Sterling"), and PT USA, who hereby agree to the terms of the foregoing *Agreed Stipulation for Extension of Time for Defendants to Respond to Plaintiff's Complaint* ("Stipulation"), and respectfully move the Court to grant the extension requested:

- 1. On October 23, 2013, Suncoast filed its *Original Complaint* (ECF No. 1).
- 2. Defendants Scoppa and PT USA were served on October 29, 2013, and their deadline to file a responsive pleading is November 19, 2013 (ECF Nos. 9, 10).
- 3. Defendants Patel and Sterling were served on October 30, 2013, and their deadlines to file a responsive pleading is November 20, 2013 (ECF Nos. 11, 12).

4. Counsel for Suncoast and Counsel for Scoppa, Patel, Sterling and PT USA have conferred and agreed that Scoppa, Patel, Sterling, and PT USA are shall have until and including November 26, 2013 to answer, move, or otherwise respond to Plaintiff's *Original Complaint*.

WHEREAS, PREMISES CONSIDERED, Plaintiff and Defendants respectfully move the Court to enter an order extending the time by which Scoppa, Patel, Sterling, and PT USA are required to answer, move, or otherwise respond to Plaintiff's *Original Complaint* to and including November 26, 2013.

Respectfully submitted,

THE SHEENA LAW FIRM

By: /s/Danny M. Sheena DANNY M. SHEENA, P.E. State Bar No. 00792830 S.D. Texas Attorney No. 19110 Danny@sheenalawfirm.com **HUNG MICHAEL NGUYEN** State Bar No. 24056040 S.D. Tex. Atty. No. 711423 mike@sheenalawfirm.com 2500 West Loop South, Suite 518 Houston, Texas 77027-4508 (713) 224-6508 (713) 225-1560 Facsimile ATTORNEY FOR DEFENDANTS PETER SCOPPA, SANDEEP N. PATEL, THE STERLING ENGINEERING GROUP OF COMPANIES, AND PT USA

### Agreed:

/s/ Erin C. Villaseñor (by permission)

John R. Keville
John E. O'Neill
Erin C. Villaseñor
WINSTON & STRAWN LLP
1111 Louisiana Street, 25th Floor
Houston, Texas 77002-5009
(713) 651-2600
(713) 651-2700 Facsimile
ATTORNEYS FOR PLAINTIFF
SUNCOAST POST—TENSION, LTD.

### **CERTIFICATE OF CONFERENCE**

I HEREBY CERTIFY that on the 18th day of November, 2013, I conferred with Erin C. Villaseñor, counsel for Plaintiff, regarding the subject matter of the foregoing <u>Agreed Stipulation</u> <u>for Extension of Time for Defendants to Respond to Plaintiff's Complaint</u>, and she indicated she was unopposed.

Is/Danny M. Sheena

Danny M. Sheena

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 19th day of November, 2013, a true and correct copy of <u>Agreed Stipulation for Extension of Time for Defendants to Respond to Plaintiff's Complaint</u> was sent to all parties requesting notification through the Court's ECF system.

John R. Keville
John E. O'Neill
Erin C. Villaseñor
WINSTON & STRAWN LLP
1111 Louisiana Street, 25th Floor
Houston, Texas 77002-5009
(713) 651-2600
(713) 651-2700 Facsimile
ATTORNEYS FOR PLAINTIFF
SUNCOAST POST—TENSION, LTD.

<u>|s|Danny M. Sheena</u>

Danny M. Sheena